

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN
DISTRICT OF PENNSYLVANIA**

**In re: ARNOLD B. SAPP,
Debtor**

**: CHAPTER 13
:
: BANKRUPTCY NO. 18-11503**

ORDER

AND NOW, this day of January, 2019, upon consideration of the Motion of Wells Fargo Bank for Relief from the Automatic Stay, the Debtor's Answer thereto, and after notice and an opportunity to be heard by all interested parties, it is hereby ORDERED that the Motion is DENIED.

J.

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**DEBTOR'S ANSWER TO MOTION OF LNV CORPORATION ("LNV") FOR RELIEF
FROM THE AUTOMATIC STAY, WITH AFFIRMATIVE DEFENSES**

1. The allegations of paragraphs 1 through 7 of the Motion are admitted.

2. The allegations of all of the remaining paragraphs are denied or denied as stated and strict proof of same is demanded at any hearing.

AFFIRMATIVE DEFENSES

3. The Debtor advises that he in fact did make all payments due through October, 2018, and will cure all defaults by the time of the hearing.

4. Therefore, the Debtor will be at most slightly in default by the hearing date.

5. The value of the mortgaged property is at least \$350,000.

6. The amount of the Movant's claim is approximately \$315,000

7. The interests of the Movant in the property is therefore well protected by an equity cushion.

8. As there is no basis for relief from the automatic stay stated, there is no basis whatsoever for the Movant's seeking a waiver of the stay period set forth in FRBP 4001(a)(3).

WHEREFORE, the Debtor requests that this court deny the Motion.

Dated: December 23, 2018

Attorney for Debtor

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